



1315 K STREET
MODESTO, CALIFORNIA 95354-0917
TELEPHONE (209) 527-6453
FAX (209) 527-0630

June 22, 2005

Michael Johanns
Secretary
United States Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

*Regarding: APHIS-2005-0044
Comments on the National Animal Identification System's Draft
Strategic Plan and Draft Program*

Dear Secretary Johanns:

Western United Dairymen appreciates the opportunity to provide our comments on the National Animal Identification System's Draft Strategic Plan and Draft Program Standards. Western United Dairymen is a trade association of California dairy farm families. Our membership is comprised of 1,100 producers from all regions of California. Our member families are responsible for approximately 60% of the milk produced in the state. Our comments reflect our producers' concerns and questions about the system in regards to data storage and access, confidentiality, premise identification, calf tagging, terminal animal events, enforcement, and costs.

Data Storage and Access

The ability to trace back animals within 48 hours of an event of a disease outbreak is essential when every minute has the potential to further devastate our nation's animal agriculture producers. There is discussion on whether the repository should be public or privately operated. Western United Dairymen takes no position; whether public or private, the system must guarantee its ability to provide up-to-date data quickly. The repository must be secure, used only for animal disease trace back, and protected from Freedom of Information Act requests.

Confidentiality

Before full implementation of this program, it is of the greatest importance that confidentiality of the data generated is assured. The importance goes beyond proprietary information; it is of essence for homeland security. Preventing premise and movement information from being obtained and used by animal rights extremists or other possible agro-terrorists is crucial to our nation's animal agriculture farmers and our food system.

Premise Identification

Many California producers are moving their dairy animals from one of their facilities to another, such as a second dairy or their own, but separate, heifer raising

RECEIVED
JUL - 8 2005

facility. These facilities can be just down the street or a few towns away. Would these facilities be under one premise number or would they require separate numbers? Are two facilities with the same owner considered as only one premise if they are contiguous? Do the determinations of the above questions change if some of the acres are rented or leased? How would one address a rented pasture, for example, if the landowner does not want to receive a premise number?

Calf Identification and Tracking

With a majority of bull calves normally sold shortly after birth, a question arises concerning who would bear the responsibility of tagging these animals before they leave the birth facility. The bull calves typically have not been identified in the herds other than by recording the sex of the calf. Would the calf buyer, whether transferring the bulls to the saleyard or raising them, be able to carry a certain amount of each of his customer's allotment of identification numbers to place in the calves as they are picked up? Could buyers possess their own set of identification numbers, keeping in their records the farm from which they received the calf?

Many operations also send heifers to be raised at heifer ranch operations to a certain point in the calves' development. Would the heifer ranch be responsible for recording the heifer movement in and out of their facility?

If a bull or heifer calf is born dead or dies shortly after birth, would the animal need to be tagged to go to rendering?

Terminal Animal Tracking

A concern some California producers have with the tracking system of the National Animal Identification System is how tracking of a rendering service on a given day with a given truck would be managed. In the event of a disease outbreak, this could be valuable information. If the recording of death and tag destruction were combined, the pickup of the animal by an identified truck could be recorded as an event as it is in any other movement. When the animal's carcass has arrived at a rendering plant and has been processed it could then record the death and the destruction of the identification. In most other instances the death and the tag destruction would occur at the same location already, so combining the two should not create a tracking problem.

Enforcement

The Draft Program Standards identify many of the responsibilities of administering the system, but there is no clear indication of who will be responsible for enforcing these activities when the system becomes mandatory in 2009. Who will be monitoring animal identification and movement to ensure they are being correctly recorded and reported when the system becomes mandatory? What actions will be taken against those that do not complying with the system? Will these actions be equal for commercial producers and as well as hobby farms with only a few animals? Would the enforcement activities be done at the federal level or through the states?

Costs

The National Animal Identification System costs will be quite significant. However, this program is important, and it provides benefits to the nation as a whole. It is therefore important that this system remains a government-funded program, not a program funded through non-recoverable producer fees. Identification tags and readers for the system will already be an added cost that producers cannot pass along to the consumer. Some producers will be able to utilize the RFID tags as a management tool, but even with a beneficial use, there is a new cost. If there were cost reductions to begin the implementation of the program by way of a program payment or a cost-share opportunity, it might not only ease the initial start of the program for producers and the markets they enter, but it could also provide an incentive to participate before the system becomes mandatory.

Western United Dairymen would like to commend the Department for their efforts in moving forward with this monumental task. There are many questions and challenges ahead that the Department will need to address. We hope that the National Animal Identification System will provide a solid framework while having the flexibility to address both the various livestock species as well as the differences in operations and operational practices within a species. Thank you for the opportunity to comment.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael L. H. Marsh".

Michael L. H. Marsh, CPA
Chief Executive Officer

MM/kmr

cc: Kristy Rocha
Case Van Steyn